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February 10, 2022

The Honorable J. Paul Oetken
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *USA v. Johnny Roman*
Dkt. No.: 1:21-cr-00190-JPO

Dear Judge Oetken:

The undersigned represents Johnny Roman in the above-captioned Action. As you are aware, the Court has ordered that Defendant's Motions in this matter were due February 10, 2022.

Unfortunately, I only recently joined the law firm of Lebedin Kofman, LLP, and took over the handling of this case in the wake of Conor McNamara, the attorney previously handling the matter's resignation from the firm. I need additional time to have meaningful discussions with Mr. Roman and to further prepare his defense. For that reason, we are requesting an adjournment of the February 10 due date for motions and the corresponding conference, for 50 days, or until the next date the Court has available, so as to fully and thoroughly communicate with Mr. Roman and work toward a productive resolution.

I have conferred with AUSA Dell, and she informed me that she consents to the 50 day extension. On behalf of Mr. Roman, I consent to the exclusion of time for speedy trial for the duration of any adjournment granted.

If you require additional information or have any questions regarding this application, I

am available at any time to discuss the matter. Thank you for your time and attention.

Very Truly Yours,

/s/ John B. Signoriello, Esq.
John Signoriello, Esq.
Associate Attorney
Lebedin Kofman, LLP

Granted. The deadline for defendant's pretrial motions is adjourned to April 1, 2022, with opposition due by May 2, 2022, and replies by May 9, 2022. The March 24, 2022 pretrial conference is adjourned to May 26, 2022, at 2:00 pm. The Court hereby excludes time through May 26, 2022, under the Speedy Trial Act, 18 USC 3161(h)(7)(A), finding that the ends of justice outweigh the interests of the public and the defendant in a speedy trial.

So ordered.

2/11/2022



J. PAUL OETKEN
United States District Judge